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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
GOOGLE TO SUBMIT DECLARATIONS  
IN SUPPORT OF PLAINTIFFS' AUGUST  
19 AND 23, 2022 ADMINISTRATIVE  
MOTIONS TO CONSIDER WHETHER  
PORTIONS OF PLAINTIFFS' FILINGS  
SHOULD BE SEALED (DKTS. 698, 699,  
702, 704)**

The Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between  
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on August 19, 2022, Plaintiffs filed their Administrative Motions to Consider  
4 Whether Portions of Plaintiffs’ Responses to Google’s Motions to Exclude Opinions of Plaintiffs’  
5 Experts Michael J. Lasinski and Bruce Schneier Should Be Sealed (“August 19 Motions to Seal”)  
6 (Dkts. 698, 699);

7 WHEREAS, on August 19, 2022, Google received unredacted copies of Plaintiffs’ Motions  
8 to Seal and exhibits cited in Dkts. 700 and 701;

9 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the  
10 Designating Party to portions of Plaintiffs’ August 19 Motions to Seal, to establish that such  
11 designated material is sealable is Friday, August 26, 2022;

12 WHEREAS, Google has requested, and Plaintiffs do not oppose, an extension of time of 14  
13 days to Friday, September 9, 2022 will provide Google with sufficient time to submit its declaration  
14 in support of its designated materials in the filings (Dkts. 700, 701);

15 WHEREAS, on August 23, 2022, Plaintiffs filed their Administrative Motions to Consider  
16 Whether Portions of Plaintiffs’ Motion to Exclude Portions of the Rebuttal Expert Report of  
17 Konstantinos Psounis, and Plaintiff’s Motion to Strike Non-Retained Expert Declarations for Whom  
18 Google Provided No Expert Report, Should Be Sealed (“August 23 Motions to Seal”) (Dkts. 702,  
19 704);

20 WHEREAS, on August 23, 2022, Google received unredacted copies of Plaintiffs’ August  
21 23 Motions to Seal and exhibits cited in Dkts. 703 and 705;

22 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the  
23 Designating Party to portions of August 23 Plaintiffs’ Motions to Seal, to establish that such  
24 designated material is sealable is Tuesday, August 30, 2022;

25 WHEREAS, Google has requested, and Plaintiffs do not oppose, an extension of time of 14  
26 days to Tuesday, September 13, 2022 will provide Google with sufficient time to submit its  
27 declaration in support of its designated materials in the filings (Dkts. 703, 705);  
28

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs' August 19 Motions to Seal (Dkts. 698, 699) to Friday, September 9, 2022, and the deadline by which Google shall submit a Declaration in Support of Plaintiffs' August 23 Motions to Seal (Dkts. 702, 704) to Tuesday, September 13, 2022.

DATED: August 25, 2022

QUINN EMANUEL URQUHART &  
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/s/ Andrew H. Schapiro

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATIONS IN SUPPORT OF PLAINTIFFS' AUGUST 19 AND 23, 2022 ADMINISTRATIVE MOTIONS TO CONSIDER WHETHER PORTIONS OF PLAINTIFFS' FILINGS SHOULD BE SEALED (DKTS. 698, 699, 702, 704). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: August 25, 2022

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

*Counsel on behalf of Google*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative Motions to Consider Whether Portions of Plaintiffs' August 19, 2022 Filings Should Be Sealed (Dkts. 698, 699), shall be extended to September 9, 2022.

The deadline for Google to submit a Declaration in support of Plaintiffs' Administrative Motions to Consider Whether Portions of Plaintiffs' August 23, 2022 Filings Should Be Sealed (Dkts. 702, 704), shall be extended to September 13, 2022.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Judge